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July 23, 2021

VIA ECF

Honorable Frederic Block
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Government Employees Insurance Company, et al. v. Zaitsev, et al.
Docket No.: 20-cv-03495-FB-SJB

Dear Judge Block:

We write on behalf of Plaintiffs Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company, and GEICO Casualty Company (collectively “Plaintiffs”) as a follow up to our letter of May 28, 2021.

We wish to bring to Your Honor’s attention a recent decision issued by Judge Chen in Government Employees Insurance Company v. Wallegood, Inc. et al., Docket No.: 21-CV-1986 (July 16, 2021), which further supports Plaintiffs pending Motion to Stay and Enjoin Defendants’ Collections Proceedings, which was filed on March 15, 2021. See Docket No. 113. A copy of the Court’s Memorandum and Order is attached as Exhibit “1”.

GEICO would once again respectfully request Your Honor render a decision granting Plaintiffs Motion to Stay and Enjoin Defendants’ Collections Proceedings.

The Court’s time and attention to this request is appreciated.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ Frank P. Tiscione

Frank P. Tiscione

cc: All counsel via ECF